



OFFICE OF THE
Attorney General
STATE CAPITOL
Phoenix, Arizona 85007
August 18, 1975

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R75-488
BRUCE E. BABBITT
ATTORNEY GENERAL

75-223

John L. Brewer, D.C.
Secretary-Treasurer
State Board of Chiropractic Examiners
5002 West Glendale Avenue, Suite 101
Glendale, Arizona 85301

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Dear Doctor of Chiropractic Brewer:

We are in receipt of your letter of inquiry, dated July 14, 1975. Essentially, you ask whether the board can accept applications from graduates of chiropractic colleges that are accredited by an agency that is not listed in A.R.S. Section 32-921. B(3). The situation is deemed acute, in light of the fact that both accrediting agencies referred to in Section 32-921. B(3) have discontinued their accrediting functions.

A.R.S. Section 32-921. B(3), in relevant part, reads:

B. The applicant shall be:

...

3. A graduate of a chiropractic school or college, accredited by either the International Chiropractor's Association (ICA) or the National Chiropractic Association (NCA).....
(Emphasis added).

Your letter advised that both the ICA and the NCA no longer accredit chiropractic colleges. That function has evidently been transferred to the newly formed Council on Chiropractic Education -- an accrediting agency recognized by the Office of Education in the Department of Health, Education & Welfare.

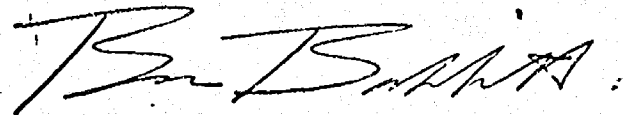
Certainly, the Council on Chiropractic Education will perform a credible job as a nationally recognized accrediting agency. Unfortunately the specificity of Section 32-921. B(3) leaves little room to question the

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legislative intent. The applicant must be a graduate of a college accredited either by the ICA or the NCA. The Board cannot, by administrative fiat, substitute the Council on Chiropractic Education for those statutory references to other accrediting agencies.

In a previous telephone communication, you advised that the Board had accrediting lists from the ICA and the NCA that dated prior to the formation of the Council on Chiropractic Education. A. R. S. Section 32-921 is silent as to whether new accrediting lists must be prepared within any particular time frame (e. g., annually). Therefore, it is our opinion that the most recent accrediting lists of the ICA and the NCA should be consulted in determining whether prospective applicants satisfy the requirements of Section 32-921. We further urge that the Board fully apprise the Legislature of this matter, when that body convenes, in order that appropriate corrective measures may be taken.

Sincerely,

A handwritten signature in dark ink, appearing to read "B. E. BABBITT". The signature is stylized with a large, sweeping "B" and a trailing flourish.

BRUCE E. BABBITT
Attorney General

BEB:JML:lv